

EXHIBIT B

From: Noam Biale
To: "Yen, Shawna (USAMA)"; Kanter, Ethan (CIV); Hennes, Stefanie (CIV)
Cc: Michael Tremonte; Alexandra Conlon; Courtney Gans; Ramya Krishnan; Jameel Jaffer; scott.wilkens@knightcolumbia.org; alex.abdo@knightcolumbia.org
Subject: RE: AAUP v. Rubio: Call/Meet & Confer
Date: Friday, May 9, 2025 1:06:33 PM
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.jpg](#)
[image004.jpg](#)

Hi Shawna, Ethan and Stephanie:

In advance of the call, we wanted to provide you with a proposed schedule that we will want to discuss. Below is our current thinking as to the significant discovery and court dates over the next couple of months. Looking forward to speaking with you at 4.

Best,
Noam

Deadline	Date
Serve initial document requests and interrogatories	May 13, 2025
Serve responses and objections to initial document requests and interrogatories	May 19 (if objections based on privilege), otherwise May 20, 2025
Status conference	May 22, 2025 at 2:00 P.M.
Serve second document requests and interrogatories	May 30, 2025
Serve responses to second document requests and interrogatories	June 6, 2025
Serve final notices of deposition	June 13, 2025
Serve requests for admission	June 20, 2025
Completion of discovery	June 27, 2025
Initial proposed findings of fact and conclusions of law (continuing throughout trial)	July 7, 2025
Final pre-trial conference	June 30, 2025 (or any date thereafter at the Court's convenience)



Noam Biale

90 Broad Street, 23rd Floor | New York, NY 10004

tel: 212.300.2445 | fax: 212.202.4156

nbiale@shertremonte.com

www.shertremonte.com



confidential and/or it may include attorney work product. If you are not an intended recipient, you may not review, copy or distribute this message. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

From: Yen, Shawna (USAMA) <Shawna.Yen@usdoj.gov>
Sent: Wednesday, May 7, 2025 6:50 PM
To: Noam Biale <NBiale@shertremonte.com>; Kanter, Ethan (CIV) <Ethan.Kanter@usdoj.gov>; Hennes, Stefanie (CIV) <Stefanie.Hennes@usdoj.gov>
Cc: Michael Tremonte <MTremonte@shertremonte.com>; Alexandra Conlon <AConlon@shertremonte.com>; Courtney Gans <CGans@shertremonte.com>; Ramya Krishnan <ramya.krishnan@knightcolumbia.org>; Jameel Jaffer <jameel.jaffer@knightcolumbia.org>; scott.wilkens@knightcolumbia.org; alex.abdo@knightcolumbia.org
Subject: RE: AAUP v. Rubio: Call/Meet & Confer

Hi Noam. Thanks for reaching out. It was very nice to meet you as well.

We are available Friday at 4 pm – 5 pm. Please invite Ethan Kanter and Stefanie Hennes as well.

By the way, will all plaintiffs' counsel (or their representatives) be at this meet and confer?

Thank you - Shawna

Shawna Yen

Assistant United States Attorney
District of Massachusetts
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 9200 | Boston, MA 02210
Phone: 617.748.7104 | Cell: 617.947.6878 | Email: Shawna.Yen@usdoj.gov

From: Noam Biale <NBiale@shertremonte.com>
Sent: Wednesday, May 7, 2025 4:18 PM
To: Yen, Shawna (USAMA) <Shawna.Yen@usdoj.gov>
Cc: Michael Tremonte <MTremonte@shertremonte.com>; Alexandra Conlon <AConlon@shertremonte.com>; Courtney Gans <CGans@shertremonte.com>; Ramya Krishnan <ramya.krishnan@knightcolumbia.org>; Jameel Jaffer <jameel.jaffer@knightcolumbia.org>; scott.wilkens@knightcolumbia.org; alex.abdo@knightcolumbia.org
Subject: [EXTERNAL] AAUP v. Rubio: Call/Meet & Confer

Dear Shawna,

It was a pleasure to meet you in court yesterday. As discussed, we wanted to set up a time to talk in more detail about the schedule for discovery and some other preliminary issues. Is there a time on Friday that would work for you and anyone else from your side you would like to join?

I am generally available between 11 and 2 and 4 to 5 that day, and I will organize a subset of our team to be on the call as well. Please let us know what works for you.

Thanks,
Noam



Noam Biale

90 Broad Street, 23rd Floor | New York, NY 10004

tel: 212.300.2445 | fax: 212.202.4156

nbiale@shertremonte.com

www.shertremonte.com



This e-mail message is intended only for the personal use of the recipient(s) named above. This message may be an attorney-client communication and as such privileged and confidential and/or it may include attorney work product. If you are not an intended recipient, you may not review, copy or distribute this message. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.